

Re: FW: DEQ review of EHAP Willamette Cove Health Consultation

Elizabeth Allen

to:

POULSEN Mike

07/17/2012 05:13 PM

Hide Details

From: Elizabeth Allen/R10/USEPA/US

To: POULSEN Mike <POULSEN.Mike@deq.state.or.us>,

If OHA determines that it's essential to the PHA, perhaps either DEQ or EPA could have a QA chemist review the data and determine if the data quality flags were properly used...

Elizabeth Allen

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-----POULSEN Mike <POULSEN.Mike@deq.state.or.us> wrote: -----

To: Elizabeth Allen/R10/USEPA/US@EPA

From: POULSEN Mike <POULSEN.Mike@deq.state.or.us>

Date: 07/17/2012 04:24PM

Subject: FW: DEQ review of EHAP Willamette Cove Health Consultation

FYI.

From: POULSEN Mike

Sent: Tuesday, July 17, 2012 4:23 PM

To: HUDSON TODD

Cc: THIESSEN Kenneth; BISHOP Karen; PETERSON Jenn L; JOHNSON Keith

Subject: RE: DEQ review of EHAP Willamette Cove Health Consultation

Todd –

The following are my relatively minor comments on the draft health consultation for Willamette Cove Beaches and associated summary. If you have any questions, please give me a call.

- Mike

Summary Document

It would be helpful to add a sentence or two about investigations and remedial actions prior to 2008 so there is not an impression that the site has only recently been investigated.

On page 2, you may want to mention contaminants other than lead, such as dioxins and PCBs.

Health Consultation

Page 3, paragraph 3. There appears to be a typographical error at the end of the first sentence.

Page 7. In the summary, it may be preferable to omit details, such as the assumed days/year

exposure frequency, so that you can focus on the main message.

Page 9, fourth paragraph. The sentence regarding DSL responsibility does not appear relevant and may distract from the main purpose of the paragraph. We are also not clear on the accuracy of the statement. It may be better to focus on defining the area of the beach evaluated in this health consultation.

Page 10, last sentence. To be precise, it may be better to say “boat to shore activity” instead of ship to shore.

Page 11. Of the people who trespass, it may be more appropriate to state that you have grouped them into five groups rather than imply these are the only groups. There may be other categories of trespassers that were not considered.

Figure 1. It would be better to include a more recent photograph that does not show the barges, which have been removed.

Page 19. You might consider combining Tables 2 and 3, with “Completed” and “Potential” headings to make it clear the distinction between the two scenarios.

Page 22. In the text here, and in your response to comments on the last draft, you state that EHAP makes a comparison with the LOAEL (or NOAEL) after exceeding an HQ of 1. In contrast, EPA and DEQ do not make this refinement in risk assessments. An HQ greater than 1 is considered by EPA and DEQ as representing unacceptable risk. This difference may be confusing to the public. Similarly, as we have discussed in the past, DEQ uses an acceptable cancer risk level of 1×10^{-6} whereas EHAP uses an acceptable risk level of 1×10^{-4} .

Page 23. Some of the lead data from the May 2011 report for Willamette Cove are qualified. Guidance from EPA’s 1989 Risk Assessment Guidance for Superfund document on using data from samples with associated blanks containing chemicals is that the sample should be considered a positive detection only if the concentration of the chemical in the site sample exceeds five times the maximum amount detected in any blank. Otherwise the sample should be considered non-detect. Table 1A from the May 2011 data report includes the following footnote for the “B” data qualifier:

B = Analyte was detected in associated method blank above the reporting limit. Sample concentrations were less than 5 times the concentration detected in the method blank.

This raises concerns about the validity of some of the soil lead results. However, we were not able to confirm the finding that the lead sample results were similar to the concentration in the blank sample. For example, the laboratory analytical results for sample WC-2 show B-qualified results for lead, selenium, and silver. Lead was detected in the sample at 770 mg/kg. The method blank associated with the sample shows the following detected results.

Chemical	Blank Result	Reporting Limit
Lead	0.031 J mg/kg	0.35 mg/kg
Selenium	0.086 J mg/kg	0.35 mg/kg
Silver	0.32 J mg/kg	0.35 mg/kg

For all of the chemicals, the blank results were less than the reporting limits. The lead concentration in the blank is orders of magnitude less than the concentration in the site sample. This calls into question the footnote from Table 1A. The results for lead appear valid for use in risk assessments. We will continue to investigate this issue.

From: THIESSEN Kenneth

Sent: Monday, July 16, 2012 5:25 PM
To: BISHOP Karen; HUDSON TODD; POULSEN Mike
Cc: THIESSEN Kenneth
Subject: DEQ review of EHAP Willamette Cove Health Consultation

I don't have any comments on the Health Consultation draft received 7/13/2012. Mike Poulsen will provide his comments to you tomorrow, Tuesday.

Sincerely,
Ken Thiessen

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